Census Scientific Advisory Committee Meeting September 21, 2023

Comments of the Coalition on Human Needs

I submit these comments on behalf of the Coalition on Human Needs. The Coalition on Human Needs (CHN) is an alliance of national organizations working together to promote public policies which address the needs of low-income and other vulnerable populations. The Coalition's members include civil rights, religious, labor, and professional organizations, service providers and those concerned with the well-being of children, women, and people who are aging or with disabilities. The Coalition is one of four organizations that formed and continues to co-lead Count All Kids, a national group of child-serving organizations that is working to improve the count of young children in all Census Bureau demographic products.

We submit these comments after reviewing the presentations that were provided in advance of the meeting. We thank you for providing some of the presentations with sufficient time for us to review them and submit comments.

We have four major comments:

- We ask you to conduct a second round of ACS roster question tests with more significant changes, because the changes tested the first time were relatively minor and we think that may explain why the tested language did not improve the count of young children. We believe a second, broader, test is merited because we know many young children are missed when people respond to the ACS or the decennial census but leave their young children off. We also ask you to conduct a significance analysis to see if the test question improved responses for particular subgroups of children such as Black or Hispanic children, even if it had no improvement for children as a whole.
- We strongly support the use of administrative records to supplement self response census information, as is described in the continuous census study. We thank the Bureau for including in its 2030 research agenda "**Research on the Undercount of Young Children Using Administrative Data**" and **"Improving Within-Household Coverage Using Administrative Data"** and ask the Bureau to share its research strategy and findings on these projects. As part of this research, we suggest that the Census Bureau should test the idea of imputing records for young children into households where they are left off the response by using the ACS.
- However, we urge the Bureau to make clear that a decennial census conducted solely with administrative records would be unfit for use, particularly for redistricting, because the Bureau's own administrative census study shows many administrative records do not have address data.
- Thank you again for creating the Base Evaluation Research Team (BERT), and for working to steadily improve the accuracy of the population estimates through a blended base approach. We also want to thank you again for the adjustment for young children in the base population used in vintage 2021 and 2022 estimates. We also believe that it is very important to make assessments of the impact of the blended base on the count of other racial and ethnic groups.

We understand that this is planned once the Bureau has a usable modified race file with privacy protections. We believe that this is sufficiently important that it justifies using part of the "privacy budget". We also note that it is the state and local data that affects the allocation of federal funds and that therefore it is very important to work to improve the accuracy of those components of the blended base; we particularly draw attention to the state total population numbers, which are key in setting the Federal Medicaid Assistance Percentage which drives a very large component of federal funds to states for Medicaid, the Children's Health Insurance Program, child care funding, foster care, and adoption assistance. We therefore urge the BERT team to pay careful attention to any possibility of improving the accuracy of this data.

Thank you for the opportunity to submit these comments. Please address any questions to Deborah Weinstein at dweinstein@chn.org